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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

GERARDO Z MORENO,
Plaintiff,

vs.

ANDREW SAUL,
Commissioner of Social Security,
Defendant.

Case No. 1:20-CV-00788-BAM

STIPULATION AND
ORDER FOR EXTENSION OF
TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from May 24, 2021 to June 23, 2021, for Plaintiff to serve on defendant with PLAINTIFF'S OPENING BRIEF. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due on the same week. Counsel requires additional time to brief the issues thoroughly

1 for the Court's consideration. Defendant does not oppose the requested extension.
2 Counsel apologizes to the Defendant and Court for any inconvenience this may
3 cause.

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5 Respectfully submitted,

6 Dated: April 27, 2021

PENA & BROMBERG, ATTORNEYS AT LAW

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8 By: /s/ Jonathan Omar Pena
9 JONATHAN OMAR PENA
10 Attorneys for Plaintiff
11

12 Dated: April 27, 2021

PHILLIP A. TALBERT
Acting United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

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17 By: */s/ Marcelo N. Illarmo
18 Marcelo N. Illarmo
19 Special Assistant United States Attorney
20 Attorneys for Defendant
21 (*As authorized by email on April 27, 2021)
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1 **ORDER**

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3 Pursuant to the parties' stipulation, and good cause appearing, Plaintiff's

4 request for an extension of time to file his Opening Brief is GRANTED. Plaintiff's

5 Opening Brief shall be filed on or before June 23, 2021. All other dates in the

6 Court's Scheduling Order are extended accordingly.

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8 IT IS SO ORDERED.

9 Dated: April 28, 2021

10 /s/ Barbara A. McAuliffe

11 UNITED STATES MAGISTRATE JUDGE

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